

Jaba Tsitsuashvili (CA Bar No. 309012)
Patrick Jaicomo* (MI Bar No. P-75705)
Trace Mitchell* (DC Bar No. 1780794)
INSTITUTE FOR JUSTICE
901 N. Glebe Road, Suite 900
Arlington, VA 22203
Phone: (703) 682-9320
Fax: (703) 682-9321
jtsitsuashvili@ij.org

*Admitted pro hac vice

Anna M. Barvir (CA Bar No. 268728)
MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
Long Beach, CA 90802
Phone: (562) 216-4444
Fax: (562) 216-4445
abarvir@michellawyers.com

Counsel for Plaintiffs

Stephanie Hinds (CA Bar No. 154284)
United States Attorney
Michael Lo (NY Bar No. 4325163)
Chief, Civil Division
Michael A. Keough (NY Bar No. 5199666)
Assistant United States Attorney
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Fax: (415) 436-7234
michael.keough@usdoj.gov

*Counsel for the United States of America,
Robin Lee, Jeff Agster, Mark Hodges, and
Eva Chan*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

RENÉ QUIÑONEZ and
MOVEMENT INK LLC,

Plaintiffs,

v.

UNITED STATES OF AMERICA; and
JEFF AGSTER, EVA CHAN, STEPHEN
FAJARDO, MARK HODGES, ROBIN LEE,
and DOES 1 through 2, United States Postal
Service and United States Postal Inspection
Service officials in their individual capacities,

Defendants.

Case No. 3:22-cv-3195-WHO

**STIPULATION IN SUPPORT OF UNOP-
POSED MOTION FOR ADMINISTRA-
TIVE RELIEF TO EXCEED PAGE LIMIT-
TATIONS**

Judge: Hon. William H. Orrick

Pursuant to Federal Rule of Civil Procedure 7 and Civil Local Rule 7-11 and 7-12, and
subject to the Court's approval, Plaintiffs René Quiñonez and Movement Ink LLC and Defendants
the United States of America, Robin Lee, Jeff Agster, Mark Hodges, and Eva Chan, by and through
undersigned counsel, hereby stipulate to allow Plaintiffs to exceed the otherwise applicable page

1 limitations for Plaintiffs' Consolidated Opposition to Defendants' Motions to Dismiss. The parties
2 stipulate that the page limit for Plaintiffs' Consolidated Opposition to Defendants' Motions to
3 Dismiss will be 30 pages, rather than the 25-page limit set by Civil Local Rule 7-4(b).

4 This stipulation does not prejudice Defendants' ability to file separate reply briefs in support
5 of their respective motions.

6 SO STIPULATED.
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

United States District Court
Northern District of California

Dated: February 7, 2023

s/ Jaba Tsitsuashvili
Jaba Tsitsuashvili (CA Bar No. 309012)
Patrick Jaicomo* (MI Bar No. P-75705)
Trace Mitchell* (DC Bar No. 1780794)
INSTITUTE FOR JUSTICE
901 N. Glebe Road, Suite 900
Arlington, VA 22203
Phone: (703) 682-9320
Fax: (703) 682-9321
jtsitsuashvili@ij.org

*Admitted pro hac vice

Anna M. Barvir (CA Bar No. 268728)
MICHEL & ASSOCIATES, P.C.
180 E. Ocean Blvd., Suite 200
Long Beach, CA 90802
Telephone: (562) 216-4444
Fax: (562) 216-4445
abarvir@michellawyers.com

Counsel for Plaintiffs

s/ Michael A. Keough
Stephanie Hinds (CA Bar No. 154284)
United States Attorney
Michael Lo (NY Bar No. 4325163)
Chief, Civil Division
Michael A. Keough (NY Bar No. 5199666)
Assistant United States Attorney
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Fax: (415) 436-7234
michael.keough@usdoj.gov

*Counsel for the United States of America,
Robin Lee, Jeff Agster, Mark Hodges, and
Eva Chan*

***Pursuant to Civ. L.R. 5-1(h)(3), the filer of
the document has obtained approval from
this signatory.*

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2023

Hon. William H. Orrick
United States District Court Judge